Automated Commercial Environment—Requirements Recommendation

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Requirement

Post Release: Importers should have flexibility to use an IASS or any of the prescribed methods for completing statistical and accounting requirements. There should be three tracks for completing accounting and statistical requirements:

(1) Full data at release, or within a specified period after release,

(2) Release followed by the filing of an IASS containing statistical and revenue data for *each release* not later than a specific number of days after the close of the month in which a shipment is released' (although filers will retain the opportunity to file at any earlier time after release) (see ENT-003 Business Need II), and

(3) Release followed by an IASS summarizing statistical and revenue activity for the previous month, filed not later than a specific number of days after the close of the month.

Business Need

(A) Requirement (1), above contemplates that the current entry/entry summary system of filing will be retained as an option for the filing of revenue and statistical data in addition to the option to file a monthly IASS.

(1) Summary within a specified time after release – the system must continue to give effect to the statutory option of filing an individual entry summary for each release of merchandise.

(2) Full data at release – In many instances, it is impractical to file a separate entry summary for each release (i.e., importer is already required to file significant data up front for release, hence it is more efficient and less costly to file all data up-front at release rather than file twice). Therefore, many importers require the option to "certify" full summary data beginning when the release declaration is filed.

(a) "Fatal errors" – For reasons required by Census or for other reasons, summary data may be rejected as a fatal error, subject to explanation or correction by the filer. When full data is filed at release this can create critical problems for the importer if the release is delayed because of the "fatal error."

(b) Business needs to cope with fatal errors when full data is filed at release

(i)   For data not required to determine admissibility (subject to policy discussions, e.g., classification at the 9th and 10th digit), release should be allowed.

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[1] .Richard M. Belanger, ERP III Letter to Stuart Seidel, April 10, 2001.

(ii) Fatal error criteria should be available within the data warehouse capabilities of the system so that filers can regularly adapt validation tests that will prevent the errors from occurring.

(B) IASS containing statistical and revenue data for *each release* – See ENT-003 Business Need II, above.

(C) IASS summarizing statistical and revenue activity – See ENT-003, generally. This type of IASS will contain data that is consolidated (rolled up) by category. For example, all monthly imports of merchandise subject to the same tariff number and country of origin and special program indicator may be totaled on one IASS line. In the alternative, a filer may break up one category of merchandise into 2 or more IASS lines. This may be necessary for reasons such as date sensitivity (e.g., a dumping order is implemented mid month, see also ENT-003 Business Need IB4, above) or because the importer needs flexibility to group together only merchandise that will be flagged for Reconciliation. Ultimately, the goal is for the IASS process to accommodate the efficient filing of consolidated data from importers' and filers' own business systems (e.g., inventory systems).

Technical Need

Benefits

The flexible choice of summary data options will avoid the problems associated with "one size fits all" requirements. Filers will not be locked in to processes that are inconsistent with their own business practices.

Risks

- System must be capable of accepting data more frequently when required by Congress (e.g., every week for special commodities).

- How to account for tariff changes during a month? Addressed in Business Need IB4 on ENT-003..

- Impact on Customs and Census telecommunications and computing facilities if everyone sends in data at the same time.

Related Subcommittees

Priority: **Critical** ☒ **High** ☐ **Medium** ☐ **Low** ☐